

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SONITHA SCALES, ALICIA THOMAS,  
STEPHEN MCNUTT, JEFF PORTER, &  
PAUL SIMONE, individually, and on behalf  
of all other similarly situated individuals,

Plaintiffs,

v.

JAY MCGRAW; ERIC WELCH;  
CREDITSERVE, INC.; MINTO FINANCIAL,  
d/b/a MINTO MONEY; and JOHN DOES 1-  
10,

Defendants.

Case No. 1:24-cv-11575

Judge: Hon. Manish S. Shah

**DECLARATION OF ROBERT ERHART IN SUPPORT OF DEFENDANTS'  
MOTIONS TO COMPEL ARBITRATION**

I, Robert Erhart declare:

1. I am currently employed as the General Manager of defendant Minto Financial d/b/a Minto Money ("Minto"). I am over eighteen years of age. I submit this Declaration in support of the Defendants' Motions to Compel Arbitration. Except where based upon review of records and documents regularly maintained in the ordinary course of business, all of the matters set forth below are within my personal knowledge and, if called as a witness, I could and would competently testify thereto.

2. In connection with my duties as General Manager, I have access to and am generally familiar with the records maintained by Minto. The documents referred to herein and attached hereto were obtained from Minto's records. The records referred to herein and attached hereto were created and kept in the ordinary course of business and were created at or near the time of occurrence of the matters set forth by the record and/or were created based upon

information transmitted by a person with knowledge of the matters set forth in the record.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the first Loan Agreement dated January 27, 2022, between Minto Financial, as lender, and Plaintiff Sonitha Scales, as borrower, for Ms. Scales's loan number ending in 2408 (PII redacted).

4. Attached hereto as **Exhibit 2** is a true and correct copy of the Loan Agreement dated May 1, 2024, between Minto Financial, as lender, and Plaintiff Stephen McNutt, as borrower, for Mr. McNutt's loan number ending in 5435 (PII redacted).

5. Attached hereto as **Exhibit 3** is a true and correct copy of the Loan Agreement dated October 30, 2024, between Minto Financial, as lender, and Plaintiff Jeff Porter, as borrower for Mr. Porter's loan number ending in 7173 (PII redacted).

6. Attached hereto as **Exhibit 4** is a true and correct copy of the Loan Agreement dated August 2, 2021, between Minto Financial, as lender, and Plaintiff Paul Simone, as borrower, for Mr. Simone's loan number ending in 8470 (PII redacted).

7. Attached hereto as **Exhibit 5** is a true and correct copy of the Loan Agreement dated December 14, 2024, between Minto Financial, as lender, and Plaintiff Alicia Thomas, as borrower, for Ms. Thomas's loan number ending in 4924 (PII redacted).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 19<sup>th</sup> day of March, 2025 at Minto, Alaska.

Signed by:  
  
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Robert Erhart